

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: _____ DATE FILED: 11/30/2021
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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

WORTH RISES and AMERICAN  
OVERSIGHT,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND  
SECURITY; U.S. IMMIGRATION AND  
CUSTOMS ENFORCEMENT; and U.S.  
DEPARTMENT OF JUSTICE,

Defendants.

20 Civ. 1876 (AT)

**STIPULATION AND ORDER OF  
SETTLEMENT AND DISMISSAL  
PURSUANT TO FED. R. CIV. P. 41(a)**

WHEREAS plaintiffs Worth Rises and American Oversight (together, “Plaintiffs”) made requests under the Freedom of Information Act (“FOIA”) dated July 23, 2019 (the “FOIA Requests”), seeking records from defendants U.S. Department of Homeland Security (“DHS”), U.S. Immigration and Customs Enforcement (“ICE”), and U.S. Department of Justice (“DOJ”) (collectively, “Defendants”);

WHEREAS Plaintiffs filed a complaint in the above-captioned matter on March 3, 2020, seeking disclosure of records responsive to the FOIA Requests;

WHEREAS after conferral and negotiations between the parties, through their counsel, Plaintiffs and DHS, ICE, and three components of DOJ—the DOJ Office of Information Policy (“DOJ-OIP”), the DOJ Office of Justice Programs (“DOJ-OJP”), and the DOJ Bureau of Prisons (“DOJ-BOP”)—reached agreements regarding the scope of the search and processing of potentially responsive records under the FOIA Requests through an order, entered on August 11, 2020, *see* ECF No. 31;

WHEREAS DHS, ICE, DOJ-OIP, DOJ-OJP, and DOJ-BOP conducted searches and processed and produced non-exempt documents or portions of non-exempt documents to Plaintiffs in response to the FOIA Requests;

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs and Defendants, through their undersigned counsel, as follows:

1. The records produced by DHS, ICE, DOJ-OIP, DOJ-OJP, and DOJ-BOP fully resolve any and all claims Plaintiffs now have or may hereafter acquire against DHS, ICE, DOJ, or the United States of America (“United States”), or any department, agency, officer, or employee of DHS, ICE, DOJ, and/or the United States, for the release of the records arising from Plaintiffs’ FOIA Requests at issue in this action.

2. All claims in the above-captioned action are hereby dismissed, without costs or fees to any party, pursuant to Rule 41(a) of the Federal Rules of Civil Procedure.

3. Upon entry of this Stipulation and Order by the Court, this case shall be closed, and all pending deadlines shall be cancelled.

4. The parties understand and agree that this Stipulation and Order contains the entire agreement between them, and that no statements, representations, promises, agreements, or negotiations, oral or otherwise, between the parties or their counsel that are not included herein shall be of any force or effect.

5. Counsel for Defendants will be filing this Stipulation and Order via the ECF system on behalf of all parties. Pursuant to Rule 8.5(b) of the Electronic Case Filing Rules & Instructions of the U.S. District Court for the Southern District of New York, counsel for Plaintiffs consents to the electronic filing of this Stipulation and Order by counsel for Defendants.

Dated: Washington, D.C.  
November 29, 2021

/s/ Mehreen Rasheed  
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*Attorney for Plaintiffs*

Dated: New York, New York  
November 29, 2021

DAMIAN WILLIAMS  
United States Attorney  
*Attorney for Defendants*

By: /s/ Natasha W. Teleanu  
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SO ORDERED.

Dated: November 30, 2021  
New York, New York



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ANALISA TORRES  
United States District Judge